IN THE DISTRICT COURT OF THE UNITED STATES

For the Western District of New York

October 2019 GRAND JURY (Impaneled 10/11/2019)

THE UNITED STATES OF AMERICA

-vs-

QUONDALL DAVIS a/k/a Hotdog

Violations:

Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(2)

(2 Counts and Forfeiture Allegation)

COUNT 1 (Sex Trafficking of a Minor)

The Grand Jury Charges That:

Between in or about July 2017 and in or about February 2018, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the defendant, **QUONDALL DAVIS a/k/a Hotdog**, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, Victim 1, a person known to the Grand Jury, a person who had not attained the age of 18 years, knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe Victim 1, that Victim 1 had not attained the age of 18 years, and that Victim 1 would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(2).

COUNT 2 (Sex Trafficking of a Minor)

The Grand Jury Further Charges That:

Between in or about August 2017 and on or about November 12, 2017, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the defendant, **QUONDALL DAVIS a/k/a Hotdog**, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, Victim 2, a person known to the Grand Jury, a person who had not attained the age of 18 years, knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe Victim 2, that Victim 2 had not attained the age of 18 years and that Victim 2 would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(2).

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon conviction of either of the offenses alleged Counts 1 and 2 of this Indictment, the defendant, **QUONDALL DAVIS a/k/a Hotdog**, shall forfeit to the United States, pursuant to Title 18, Untied States Code, Section 1594(d)(1), any property, real and personal, that was used or intended to be used to commit or to facilitate the commission of such offense, including but not limited to the following:

a) One Black ZTE cellular telephone seized from the defendant's person.

All pursuant to Title 18, United States Code, Section 1594(d).

DATED: Rochester, New York, March 5, 2020.

JAMES P. KENNEDY, JR. United States Attorney

BY: s/MELISSA M. MARANGOLA

Assistant U.S. Attorney

United States Attorney's Office Western District of New York 100 State Street, Room 500 Rochester, New York 14614

585/399-3925

Melissa.Marangola@usdoj.gov

A TRUE BILL:

s/FOREPERSON